This is Exhibit "D" mentioned and referred to in the Affidavit of Charles M. Wright, sworn before me at the City of London, in the County of Middlesex, this 4th day of July, 2014.

A Commissioner, etc.



nontréal - otlawa - toronto - hamfilton - waterloo region - calgary - vancouver - beijing - moscow - london

January 21, 2013

SENT TO EMAIL

Jennifer Stam Direct 416-862-5697 jennifer.stam@gowlings.com

THE SERVICE LIST

Dear Sirs/Mesdams:

Re: Sino-Forest Corporation ("SFC"): Court File #CV-12-9667-00CL

We refer to SFC's plan of compromise and reorganization dated December 3, 2012 (as the same may be amended, varied or supplemented from time to time in accordance with its terms, the "Plan"), the Plan Sanction Order dated December 10, 2012 (the "Sanction Order") and our letter to the Service List dated January 11, 2013 (the "January 11 Letter") and hereby give notice to the Service List of the following matters concerning the Plan. Capitalized terms used herein but not defined have the meaning given to them in the Plan.

SFC today announced that the Plan Implementation Date, which was expected to be January 17, 2013, is expected to be January 23, 2013. This date has been selected by SFC with the consent of the Monitor and the Initial Consenting Noteholders.

In addition, pursuant to and in accordance with Section 11.2(a) of the Plan, David Horsley has become a "Named Third Party Defendant" under the Plan and a revised "Schedule A" to the Plan is attached to this letter. In accordance with Section 7.1(n) of the Plan, as a result of becoming a Named Third Party Defendant under the Plan, Mr. Horsley shall not be entitled to receive any distributions on account of Affected Claims under the Plan.

In addition, on the consent of SFC, the Monitor, the Initial Consenting Noteholders, counsel to the Ontario Class Action Plaintiffs, and in accordance with section 1.1 of the Plan, the "Indemnified Noteholder Class Action Limit" under the Plan, which had previously been reduced to \$25 million as it relates to Mr. Horsley as set out in our January 11 Letter, has been returned to \$150 million. The return of the the Indemnified Noteholder Class Action Limit to \$150 million as it relates to Mr. Horsely has been incorporated into and forms a part of the Plan as approved by the Sanction Order.

With the addition of Mr. Horsley as a "Named Third Party Defendant", all affected defendants named in the Class Actions have now become Named Third Party Defendants under the Plan or otherwise waived their entitlement to receive distributions under the Plan. As such, the Unresolved Claims Reserve has been correspondingly, further reduced to eliminate any reserve for Class Action Indemnity Claims. The Unresolved Claims Reserve has now been set at an aggregate amount of \$1.7 million, which consists of (a) certain unresolved Claims in respect of Defence Costs in the amount of \$1.5 million; and (b) certain other Affected Creditor Claims that have been identified by the Monitor as Unresolved Claims in an amount up to \$200,000. The reduction of the Unresolved



Claims Reserve to an aggregate amount of \$1.7 million has occurred with the consent of the Monitor and the Initial Consenting Noteholders in accordance with section 1.1 of the Plan, and has been incorporated into and forms a part of the Plan as approved by the Sanction Order.

The establishment of the Unresolved Claims Reserve is not an admission by SFC, the Monitor or any other party (including the Initial Consenting Noteholders) as to the validity of any such Claims and all rights to dispute such Claims are reserved.

Sincerely,

GOWLING LAFLEUR HENDERSON LLP

lennifer Stam

JS

SCHEDULE A

NAMED THIRD PARTY DEFENDANTS

- 1. The Underwriters, together with their respective present and former affiliates, partners, associates, employees, servants, agents, contractors, directors, officers, insurers and successors, administrators, heirs and assigns, excluding any Director or Officer and successors, administrators, heirs and assigns of any Director or Officer in their capacity as such.
- 2. Ernst & Young LLP (Canada), Ernst & Young Global Limited and all other member firms thereof, together with their respective present and former affiliates, partners, associates, employees, servants, agents, contractors, directors, officers, insurers and successors, administrators, heirs and assigns, excluding any Director or Officer and successors, administrators, heirs and assigns of any Director or Officer in their capacity as such, in the event that the Ernst & Young Settlement is not completed.
- 3. BDO Limited, together with its respective present and former affiliates, partners, associates, employees, servants, agents, contractors, directors, officers, insurers and successors, administrators, heirs and assigns, excluding any Director or Officer and successors, administrators, heirs and assigns of any Director or Officer in their capacity as such.
- 4. Allen Chan, together with his successors, administrators, heirs, assigns and insurers.
- 5. Kai Kit Poon, together with his successors, administrators, heirs, assigns and insurers.
- 6. David Horsley, together with his successors, administrators, heirs, assigns and insurers.